

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA,

APPELLEE,

VS.

No. 14-4390

VENDAI LAPRIEST IRICK

No. 14-4397

AND

No. 14-4407

RODNEY JERROLD DEVIN BYRD

And

DENZEL TIMOTHY RASHEEM SHIVERS

APPELLANTS.

APPELLANTS' UNOPPOSED MOTION TO EXTEND TIME
FOR FILING OPENING BRIEF

Come now appellants Irick, Byrd and Shivers, through undersigned counsel, and move to extend the time for filing their opening brief until on or before November 14, 2014, based upon the following:

1. This is an appeal made by codefendants that pleaded guilty to criminal conduct. The cases have been consolidated for appeal.
2. Appellants' reply brief is due on October 14, 2014.
3. Logistical problems have been encountered in our attempts to construct, draft and provide input for the drafting of appellants' opening brief. This is because we have three counsels with offices in different locations representing clients who are housed in different locations. This has prevented us from filing our opening brief within the time set.
4. We request until November 14, 2014 to do so.

5. Counsel has consulted with AUSA Kyle Pousson one of the lawyers representing the United States in this matter. He has no objection to the granting of this request for extension.

6. This is the first request for extension.¹

WHEREFORE, it is respectfully requested that this motion be granted and that the time for filing appellant's reply brief be extended until November 14, 2014.

Respectfully Submitted

/s/ Ferris R. Bond

Ferris R. Bond

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Counsel for Appellant Denzel Timothy Rasheem Shivers

¹ Appellant Byrd sought and was granted a tolling of the Briefing schedule to allow him to order a necessary transcript,

/s/ John J. Cacheris

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Counsel for Appellant Denzel Timothy Rasheem Shivers

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of October, 2014, a copy of the foregoing was sent via electronic means to all parties in this action.

/s/ Ferris R. Bond

Ferris R. Bond